

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GATSBY FRIMPONG,

Plaintiff,

-against-

EVERYREALM INC., REPUBLIC COMPOUND
LLC, d/b/a REPUBLIC REAL ESTATE,
REPUBLIC OPERATIONS LLC d/b/a REPUBLIC,
OPENDEAL INC., d/b/a REPUBLIC, OPENDEAL
PORTAL LLC, d/b/a REPUBLIC, JESSE
YORIO in her individual and professional
capacities, JANINE YORIO in his individual and
professional capacities,

Defendants.

Case No. 1:22-CV-10487

PLEASE TAKE NOTICE that, upon the concurrently filed Memorandum of Law, Defendants OpenDeal Inc. and OpenDeal Portal LLC (collectively “Non-Employer Defendants”) move this Court before the Honorable Robert W. Lehrburger, United States District Magistrate Judge at the United States Courthouse for the Southern District of New York, at a time and date to be set by the Court, for an order dismissing Plaintiff Gatsby Frimpong’s Original Complaint [ECF 1] pursuant to FED. R. CIV. P. 12(b)(6) because the complaint fails to state a claim upon which relief can be granted against the Non-Employer Defendants.

[signature page follows]

Dated: February 8, 2023
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ Jason T. Weber

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OpenDeal Portal LLC*